

Department of Public Health, Division of Air Quality (Cleveland Local Air Agency)

Date: February 11, 2004
To: Tammy Van Walsen, Ohio EPA
CC: Jeanne Mallet, Ohio EPA Legal
Through: Andrew D. Shroads, Field Enforcement Manager, CLAA
From: Valencia White, Environmental Enforcement Specialist, CLAA
RE: Morgan Electro Ceramics EAR Revision

Tammy,
Morgan Electro Ceramics, Inc. (1318031627) has submitted the a permit-to-install (PTI) application and confirmation of their submission of Fee Emissions Reports for calendar years 1994 through 2003. These documents were required in reference to their original Notice of Violation. The EAR submitted in January for this facility has been revised (with redline/strikeout) to reflect the ongoing compliance milestones Morgan has achieved. Please do not hesitate to call me at 216-664-2953 or Andrew D. Shroads at 216-664-3213 if you require additional information.

VW

Attachments: Revised pages of Morgan's EAR (pages 2, 5, 11 and 12)
Exhibit 16: PTI submittal of L003 (replacement for P019)
Exhibit 17: Verification/Certification Receipt for electronic submittal of Title V application
Exhibit 18: Fee Emissions Reports for years 1994-2003



LAW ENFORCEMENT INVESTIGATORY RECORD

DIVISION OF AIR POLLUTION CONTROL
ENFORCEMENT ACTION REQUEST SUMMARY TABLE

Emissions Unit	Date Violation Discovered by CLAA	Rules/Laws Violated	Violation Description and Type of Supporting Evidence (i.e. inspection, records, samples, photographs, etc.)	Duration			Multi-media Case (Y/N): Yes (Haz Waste settled) Divisions Involved: DHW and DAPC
				From	To	Total days	
L001	09/18/03	PTI #13-3371; OAC Rules 3745-31-05(A)(3) & 3745-77-04(D); ORC Sections 3704.036(C), 3704.05(A), (C), (F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)	Exceeding emissions limitations of PTI #13-3371 and MACT Standard (quarterly reports) Failure to submit a Title V permit application (inspection)	TV: 12/01/1998 Emissions: 05/01/03	TV: 01/05/04 Emissions: Unknown	TV: 1,861 Emissions: Continuing	
Unassigned (replaced P019)	09/18/03	40 CFR 63 Subpart T; OAC Rules 3745-31-02(A)(1) & 3745-77-04(D); ORC Sections 3704.036(C), 3704.05(F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)	Exceeding emissions limitations of MACT Standard (quarterly reports) Failure to submit a Title V permit application (inspection) Failure to submit a permit-to-install application (inspection)	PTI: 07/01/1999 Title V: 07/01/2000 Emissions: 03/01/2003	PTI: 01/05/04 Title V: 01/05/04 Emissions: Unknown	PTI: 1,649 Title V: 1,283 Emissions: Continuing	

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Facility	09/18/03	OAC Rules 3745-77-04(D), 3745-78-02(A), & 3745-15-03; ORC Sections 3704.036(C), 3745.11(C)(1); 3704.05(F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)	Failure to submit a Title V permit application (inspection) Failure to submit Fee Emissions Reports or Emissions Inventory Summaries Late Submission of 1995 Title V FER Late Submission of 1996 Title V FER	TV: 09/30/1996 Fee: 04/15/1998 Late 95: 04/15/96 Late 96: 04/15/97	TV & Fee: 01/05/04+ Late: 12/22/97	TV: 2,653 Fee: 2,091 Late95: 616 Late96: 251
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†Expected date based on letter issued by CDAQ on 12/04/03.

FILED

DO/LAA Action (NOV, warning letter, verbal warning, etc.)	Date	Response Received (date)	Action Required to Correct Violations	Corrective Action Costs (i.e. additional controls)		Current Compliance Status
				Total installed cost and year of record	Annual operating costs and year of record	
Notice of Violation	10/11/03	10/30/03	Submittal of PTI and Title V applications and fees	N/A - paperwork	N/A - paperwork	Not in Compliance
Receipt of Corrective Action Plan	11/11/03	11/26/03	Submittal of PTI and Title V applications and fees	N/A - paperwork	N/A - paperwork	Not in Compliance
Receipt of Corrective Action Plan	12/04/03	12/23/03	Submittal of PTI and Title V applications and FERS	N/A - paperwork	N/A - paperwork	Not in Compliance
Comments/Notes P019 was removed in 1999 and replaced by a Finishing Equipment 6342 Vapor Degreaser.						

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To: Jim Orlemann, Ohio EPA CO – DAPC Enforcement Committee Contact
Jeanne Mallet, Ohio EPA CO – Supervising Air Attorney

From: Valencia White, CLAA – Environmental Enforcement Specialist II

1. GENERAL INFORMATION CONCERNING THE FACILITY:

- (a) *Facility Name:* Morgan Electro Ceramics, Inc.
Facility Address: 232 Forbes Road
Facility Mailing Address: Bedford, Ohio 44146
- (b) *Contact Name:* William J. Hocevar, Facility Manager
Mailing address: 232 Forbes Road
Email address: www.morganelectroceramics.com
- (c) *Facility ID#:* 13-18-03-1627
County: Cuyahoga
- (d) *Responsible facility personnel (OAC Rule 3745-77-01(GG)) and contact:*
- | <u>Name:</u> | <u>Title:</u> | <u>Telephone Number:</u> |
|--------------|---------------|--------------------------|
| Peter Morten | President | (440) 232-2600 |

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- (e) *Name of parent company:* The Morgan Crucible Company plc
What is the relationship to parent: **Cleveland Division of Air Quality**
Parent's Mailing Address: Morgan House, Madeira Walk, Windsor, Berkshire, SL4 1EP, United Kingdom
Parent's Contact Name: Warren Knowlton, CEO
- (f) *Name of other responsible company or predecessor, if any:* N/A
Other Mailing Address: N/A
Other Contact Name: N/A
- (g) *Name of landowner (if applicable):* Mm Piezo Products Inc. A Corp.
Landowner's Mailing Address: 232 Forbes Road Bedford, Ohio 44146
Landowner's Contact Name: William Hocevar
- (h) *Type of facility:*
- | | | | | |
|-----------|------------------|-----------------------------|--------|---------------|
| Mega-site | Title V Major | Title V Synthetic Minor PTI | FESOP | Natural Minor |
| PSD | Emissions Offset | PSD/NSR Synthetic Minor PTI | NESHAP | MACT NSPS |
- If the facility is a TV major, please indicate for which pollutants:*
- | | | | | | | |
|-----|----|------|----|-----------------|-----------------|------|
| VOC | PE | LEAD | OC | SO _x | NO _x | HAPs |
|-----|----|------|----|-----------------|-----------------|------|

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2. GENERAL DESCRIPTION OF VIOLATION(S):

- (a) Describe the general business performed by the facility and the function(s) of the pertinent emissions unit(s) or activity(ies).*

Morgan Electro Ceramics is a subsidiary of the Morgan Crucible Company, which manufactures piezoelectric ceramics for use in computer chips and pacemakers.

- (b) Identify any complaints from the public against this facility, including any alleged, adverse health or welfare effects. (Attach a copy of any written complaints.)*

None known.

- (c) Describe any actual adverse environmental or health effects as a result of the violation(s).*

None known.

- (d) Identify any witnesses to the violation(s) (e.g., CDAQ staff, employees, members of the community, etc.).*

David Pruchenski (CDAQ), Andrew D. Shroads (CDAQ), Valencia White (CDAQ), Kristen Switzer (NEDO-DAPC), and Wade Balser (NEDO-DHWM)

- (e) Describe any extenuating circumstances that explain or mitigate the violation(s) (for penalty mitigation purposes).*

Morgan based their calculations for potential to emit (to determine Title V applicability) on actual emissions estimates rather than on the required emissions calculation utilizing 40 CFR 63 Subpart T.

Morgan self-disclosed an emissions exceedance on L001 in their March 10, 2000, Annual Report.

- (f) Has the facility shown extraordinary cooperation in achieving compliance and how (for penalty mitigation purposes)? Explain.*

No, see next question.

- (g) Has the facility exhibited extraordinary willfulness or negligence and how (for penalty augmentation purposes)? Explain.*

The facility has shown extraordinary negligence by insisting that they are not a Title V facility. Morgan's initial response to our NOV (Exhibit #12, Page 4) and statements made during the inspection indicated their continued belief that they were not a Title V facility and that no violations actually occurred. CDAQ had to issue another letter further explaining the situation in greater detail before Morgan overcame their reluctance and submitted an acceptable corrective action plan to return to compliance.

Additionally, Morgan has historically submitted information late (1995 and 1996 FERs submitted on 12/22/97; PTO application for L001 two months after requested and one

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IDEI

year after operation).

*(h) Does the facility have a history of noncompliance (for penalty augmentation purposes)?
Explain.*

L001 exceeded the 150 kg/m²/month limitation from 10/01/1999 through 12/31/1999.
Both CDAQ and US EPA agreed that further enforcement was not warranted at the time.

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- (i) *Are there any unique factors concerning the violation(s) that should augment or mitigate any penalty (e.g., non-complying total emissions are small in quantity)? Explain.*

Morgan did submit a Title V permit application on September 27, 1996, however, the facility requested in a letter dated February 6, 1998, that the Title V permit application be withdrawn.

CDAQ issued a letter on February 9, 1999, stating that a PTI modification to P019 was not required, however, that is consistent with Ohio EPA policy and guidance. P019 was replaced with a new emissions unit, which would necessitate a new PTI, not a modification to an existing PTI.

- (j) *Complete Attachment I, Chronological List of Events by describing in chronological order the communications with the facility concerning the violation(s) (including letters, telephone calls, meetings). Attach in chronological order copies of all correspondence, memoranda, laboratory and inspection data, photographs, permits, etc. that relate to the violation(s). Number each exhibit and complete Attachment II, Index of Attached Exhibits to serve as an index or table of contents for the exhibits.*

- (k) *Describe the measures the facility has taken and/or is taking to remedy the violation(s). Are these measures adequate? If possible, provide an estimate of the costs to remedy the violation(s) (i.e., total installed capital costs and year of record, and annual operation and maintenance costs and year of record) and the date the control equipment was installed and began operating or process modification was completed. (Note: This is important information to obtain in writing from the facility.)*

Morgan has agreed to submit Title V applications and a PTI for P019 (see Exhibit #14). To date, Morgan has failed to submit a corrective action plan for submission of Fee Emissions Reports or Emissions Inventory Statements. Also, Morgan has failed to explain why the emissions exceedance occurred in 2003 and what corrective actions will be taken to correct the deviation.

On December 29, 2003, CLAA received a PTI application for L003: Finishing Equipment 6342 Vapor Degreaser (replaced P019) (see Exhibit #16). On February 10, 2004, CLAA received Fee Emissions Reports for years 1994-2003.

- (l) *Provide the facility's proposed compliance schedule, if available.*

Morgan proposes to submit the required Title V permit and permit-to-install applications by January 5, 2004. CDAQ has requested completed FER and EIS submittals for previous years also by that date. No date has been established for submission of information regarding the 2003 emissions exceedance.

Is the proposed compliance schedule expeditious? If not, how should the schedule be modified?

Yes, as long as the required applications and FERs are submitted.

On January 14, 2004, CLAA received a Title V Verification/Certification Receipt for

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Morgan Electro Ceramics electronic submittal of the Title V application (see Exhibit #17)
On February 10, 2004, CLAA received Fee Emissions Reports for the years 1994-2003.

3. REQUEST FOR ENFORCEMENT ACTION:

(a) Names and telephone number of all OEPA District Office and/or local agency personnel responsible for, or having information on, this entity or violation(s):

<u>Name</u>	<u>Agency</u>	<u>Telephone Number</u>
Valencia White	CLAA	(216) 664-2953
Andrew D. Shroads	CLAA	(216) 664-3213
Wade Balser	NEDO-DHWM	(330) 963-1278

(b) What type of enforcement action is recommended and why?

Director's F&Os w/ penalty and US EPA Referral

CDAQ feels that Director's Findings and Orders with financial penalty provide an expeditious resolution to this matter, a sufficient deterrent for future non-compliance issues, and adequately penalizes Morgan for past violations. A US EPA referral is recommended since they are currently investigating the company's violations of 40 CFR 63 Subpart T.

(c) Are there additional parties that should be pursued?

None known.

(d) Does this case require immediate attention or relief (e.g., Temporary Restraining Order or Preliminary Injunction)?

No.

(e) Are there any pollution prevention projects that could be considered for credit projects? If so, what are the projects, their costs, and environmental benefits (if known)?

None known.

(f) Is this a multimedia enforcement case? If so, explain.

Possibly. CDAQ was informed by Wade Balser from Ohio EPA NEDO-DHWM that enforcement action was taken by Ohio EPA DHWM previously against this company and a settlement reached. CDAQ has no knowledge of other existing pending enforcement actions against Morgan. US EPA is also investigating the emissions exceedances in 2003.

4. SPECIFIC INFORMATION CONCERNING THE NON-COMPLYING EMISSIONS UNIT(S) [SOURCE(S)]:

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Complete attached tables; duplicate as needed.

4.a Permit and Process Information: Provide the requested information for each pertinent emissions unit or activity. For the "Attachments" section, please place an "X" in each field as applicable to identify an attachment to this EAR).

4.b Emissions: Provide the requested information for each relevant pollutant for each pertinent emissions unit or activity. For emissions units with more than one relevant pollutant, use a separate column for each pollutant (example: Column #1, Emissions Unit: K001, Pollutant: CO; Column #2, Emissions Unit: K001, Pollutant: VOC; Column #3, Emissions Unit: P001, Pollutant: VOC, etc.).

4.c Violations: Provide the requested information for each violation for each pertinent emissions unit. For emissions units with more than one violation, use a separate column for each violation [see example in 4(b) above].

Prepared by: _____ Date: _____
Valencia White, Env. Enforce. Spec. II

Approved by: _____ Date: _____
Andrew D. Shroads, Enforcement Manager

Approved by: _____ Date: _____
George Baker, Chief of Enforcement

Approved by: _____ Date: _____
Richard Nemeth, Commissioner of Air Quality

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☐ Specific Information Concerning the Non-Complying Emissions Unit(s) or Sources

4(a) Permit and Process Information			
Emissions Unit:	L001	Unassigned (replaced P019)	Facility
Process description	Open-top Perchloroethylene Vapor Degreaser (VPD-34)	Finishing Equipment 6342 Open top Vapor Degreaser	All emissions units
PWR (max)	N/A	N/A	N/A
Control equipment	Refrigerated freeboard chiller and condenser	Refrigerated freeboard chiller and condenser	N/A
Operating schedule (days/year or weeks/year)	2400 hrs/yr or 100 days/yr	2400 hrs/yr or 100 days/yr	8760 hrs/yr or 365 days/yr
Permit to Install Information			
PTI#:	13-3371	None	N/A
Application type: (Synthetic Minor, PSD, etc.)	N/A	None	N/A
Date application submitted:	11/18/97	Not yet received	N/A
Date issued:	10/07/1998	N/A	N/A
Date modified:	01/21/1999	N/A	N/A
Installation start date:	11/01/1997	07/01/1999	N/A
Installation completed date:	12/01/1997	07/01/1999	N/A
Operation start date:	12/01/1997	07/01/1999	N/A
Operation shutdown date:	N/A	N/A	N/A
Operating Permit Information			
Type: (Title V, FESOP, PTO)	Title V	Title V	Title V
Date application submitted:	09/27/1996 (withdrawal req. 02/06/1998)	Never submitted	09/27/1996 (withdrawal req. 02/06/1998)
Date issued:	N/A	N/A	N/A
Date modified:	N/A	N/A	N/A
Date expires(d):	N/A	N/A	N/A
Compliance Information			
Date(s) of inspection(s):	09/18/2003 and 10/06/2003	09/18/2003 and 10/06/2003	09/18/2003 and 10/06/2003
Date of last compliance demonstration:	09/18/2003	09/18/2003	09/18/2003

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☐ Specific Information Concerning the Non-Complying Emissions Unit(s) or Sources

Comments:	None.	None.	None.
Exhibits (include Exhibit #)			
Exhibits:	8, 9, 10, 11, 12, 13, 14	9, 11, 12, 13, 14	All

4(b) Emissions			
Emissions Unit:	L001	Unassigned (replaced P019)	Facility
Pollutant(s):	Perchloroethylene	Perchloroethylene (VOC)	VOC, PE, HAP
Allowable:	2.26 lbs./hr 9.90 tpy 150 kg/m ² /month	150 kg/m ² /month	N/A
Uncontrolled:	1.75 lbs./hr 2.09 tpy 371 kg/m ² /month	200 kg/m ² /month (January-March 2003) 785 kg/m ² /month (April-June 2003)	N/A
Actual:	1.75 lbs./hr 2.09 tpy 371 kg/m ² /month	200 kg/m ² /month (January-March 2003) 785 kg/m ² /month (April-June 2003)	N/A
Comments:	371 kg/m ² /month from April - June 2003; see comment to the right	Morgan's rolling 3 month average is reported incorrectly in lbs./ft ² /month, however their monthly report when converted to the proper units, is correct	N/A

4(c) Violations			
Emissions Unit:	L001	Unassigned (replaced P019)	Facility
Violation description:	Operating without a Title V permit and exceeding emissions limitations	Operating without a PTI, a Title V permit and exceeding emissions limitations	Operating without a Title V permit; failure to submit Title V FER/EIS; Late FER/EIS
Permit Term(s)/ Rule(s) violated:	PTI #13-3371; OAC Rules 3745-31-05(A)(3) & 3745-77-04(D); ORC Sections 3704.036(C), 3704.05(A), (C), (F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)	40 CFR 63 Subpart T; OAC Rules 3745-31-02(A)(1) & 3745-77-04(D); ORC Sections 3704.036(C), 3704.05(F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)	OAC Rules 3745-77-04(D), 3745-78-02(A), & 3745-15-03; ORC Sections 3704.036(C), 3745.11(C)(1); 3704.05(F), (G) & (J)(2); 40 CFR 70 Section 70.5(A)(1)
Start date:	TV: 12/01/1998 Emissions: 05/01/03	PTI: 07/01/1999 Title V: 07/01/2000 Emissions: 03/01/2003	TV: 09/30/1996 Fee: 04/15/1998 Late 95: 4/15/96 Late 96: 4/15/97

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☐ Specific Information Concerning the Non-Complying Emissions Unit(s) or Sources

Return to compliance date:	TV: 1/05/04 (exp) Emissions: Unknown	PTI: 01/05/2004 (expected) Title V: 01/05/2004 (expected) Emissions: Unknown	TV & Fee: 01/05/2004 (expected) Late: 12/22/97
Duration (days):	TV: 1,861 days Emit: Continuing	PTI: 1,649 days; Title V: 1,283 days; Emissions: Continuing	TV: 2,653 days Fee: 2,091 days Late 95: 616 days Late 96: 251 days
NOV date:	1st: 10/10/2003 2nd: 11/11/2003	1st: 10/10/2003 2nd: 11/11/2003	1st: 10/10/2003 2nd: 11/11/2003
Response date:	1st: 10/30/2003 2nd: 11/26/2003	1st: 10/30/2003 2nd: 11/26/2003	1st: 10/30/2003 2nd: 11/26/2003
Corrective actions:	Submit Title V application; correct problem that caused emissions exceedance	Submit Title V application and PTI application; correct problem that caused emissions exceedance	Submit Title V application; Pay past fees and submit past FER/EIS statements
Estimated cost of corrective actions:	N/A – "paperwork" violation	N/A – "paperwork" violation	N/A – "paperwork" violation
Comments:	N/A	N/A	N/A

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ATTACHMENT 1:
CHRONOLOGICAL LIST OF EVENTS

Date:	Event:
August 15, 1995	Reporting the existence of vapor degreasers at Morgan
Sept. 29, 1995	1 st Warning Letter request Morgan to submit Title V application
Oct. 10, 1995	Fax of air pollution control fees and Title V applicability questionnaire to Morgan from CLAA
Oct. 13, 1995	Submittal of the Title V applicability questionnaire and emissions fees, Morgan indicating on questionnaire that they are not Title V.
Sept. 27, 1996	Electronic submittal of Title V Application through STARS
Feb. 6, 1998	Request to withdraw Title V application for Morgan.
Feb. 18, 1998	Letter from CLAA stating that the Title V permit will be withdrawn and requiring Morgan to submit permit to operate applications for applicable sources.
Sept. 3, 1998	1 st Warning Letter from CLAA for not submitting a permit to operate application for L001
Oct. 20, 1998	2 nd Warning Letter from CLAA for not submitting a permit to operate application for L001
Nov. 20, 1998	Morgan submits PTO application for L001.
Feb. 9, 1999	P019 modification letter
Feb. 18, 1999	Clicker Note added in STARS permitting Activity Log by Erica Engel-Inshida
March 24, 2000	Exception report from Morgan to US EPA for L001.
April 8, 2003	Letter from Morgan including information for PIPL determination (non-TV)
Sept. 18, 2003	Information received from Morgan for Compliance Inspection
Oct. 6, 2003	Calculations from Inspection Report
Oct. 10, 2003	Notice of Violation from CLAA
Oct. 13, 2003	Inspection Report
Oct. 30, 2003	Response to Notice of Violation from Morgan
Nov. 11, 2003	Clarification letter for Morgan from CLAA
Nov. 26, 2003	Corrective Action Plan received from Morgan
Dec. 4, 2003	Receipt of Corrective Action Plan from CLAA
Dec. 29, 2003	Morgan submits PTI application for L003 (replacement for P019)
Jan. 14, 2004	Morgan electronically submits Title V applications through STARS
Feb. 10, 2004	Morgan submits FERs for years 1994-2003

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ATTACHMENT 2:
INDEX OF ATTACHED EXHIBITS

Exhibit #:	Date:	Description of Exhibit (NOV, letter, report, etc.)
1	8/15/95	Letter from Morgan indicating the number of Vapor Degreasers
2	9/29/95	1 st Warning Letter from CLAA for Title V applicability
3	10/10/95	Fax from CLAA enclosing a Title V questionnaire for Morgan
4	10/13/95	Fax received from Morgan
5	2/6/98	Request to withdraw Title V application received from Morgan
6	2/18/98	Letter from CLAA stating that the Title V application will be withdrawn
6A	9/98-11/98	Letters of Warning and PTO application for L001
6B	2/9/1999	P019 modification letter
7	2/18/1999	Clicker Note added in STARS permitting Activity Log by Erica Engel-Inshida
8	March 24, 2000	Exception report from Morgan to US EPA for L001.
8A	April 8, 2003	Letter from Morgan including information for PIPL determination (non-TV)
9	Sept. 18, 2003	Information received from Morgan for Compliance Inspection
10	Oct. 6, 2003	Calculations from Inspection Report
10A	Oct. 13, 2003	Inspection Report
11	Oct. 10, 2003	Notice of Violation for operating
12	Oct. 30, 2003	Response to Notice of Violation from Morgan
13	Nov. 11, 2003	Clarification letter for Morgan from CLAA
14	Nov. 26, 2003	Corrective Action Plan received from Morgan
15	Dec. 4, 2003	Receipt of Corrective Action Plan from CLAA
16	Dec. 29, 2003	Morgan's PTI submittal for L003 (replacement for P019)
17	Jan. 14, 2004	Verification/Certification Receipt for electronic submittal of Morgan's Title V application
18	Feb. 4, 2004	Morgan's submittal of Fee Emissions Reports for years 1994-2003